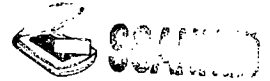


B186



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

RODERICK KING

)  
)  
)  
)  
)  
)  
)

Criminal No. 21-184

(18 U.S.C. §§ 1591(a)(1), 1591(b)(2),  
1594(a), and 18 U.S.C. § 2251(a))

**INDICTMENT**

**COUNT ONE**

The grand jury charges:

From in and around July 2017, through in and around November 2020, in the Western District of Pennsylvania and elsewhere, the defendant, RODERICK KING, attempted to and did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit by any means, in and affecting interstate and foreign commerce, Minor Jane Doe, a person, namely a minor female, whose identity is known to the Grand Jury, knowing or in reckless disregard of the fact that Minor Jane Doe had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), and 1594(a).

**FILED**

**APR 27 2021**

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

**COUNT TWO**

The grand jury further charges:

From in or around July 2017, to in and around April 2019, the exact date being unknown, but at a time distinct from that charged in Count Three, in the Western District of Pennsylvania, the defendant, RODERICK KING, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and would be transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

**COUNT THREE**

The grand jury further charges:

From in or around July 2017, to in and around April 2019, the exact date being unknown, but at a time distinct from that charged in Count Two, in the Western District of Pennsylvania, the defendant, RODERICK KING, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and would be transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

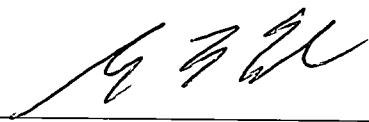
**FORFEITURE ALLEGATIONS**

1. The allegations contained in Counts One through Three of this Indictment are incorporated by reference as though fully set forth herein for the purpose of alleging criminal forfeiture, pursuant to Title 18, United States Code, Sections 1594(d), 2253(a).

2. Pursuant to Title 18, United States Code, Sections 1594(d) and 2253(a), upon conviction of an offense in violation of Title 18, United States Code, Sections 1591 and 2251, the defendant, RODERICK KING, shall forfeit to the United States of America any property that was involved in, used, or intended to be used to commit or to facilitate the commission of such offenses, or any property constituting or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and any property traceable to such property.

A True Bill,

  
FOREPERSON

  
STEPHEN R. KAUFMAN  
Acting United States Attorney  
PA ID No. 42108